

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

DAVID MACEY and  
EDWIN PAGAN III,

*Defendants.*

No. 24 Cr. 641 (JHR)

**NOTICE OF DEFENDANT DAVID MACEY'S MOTION TO DISMISS THE  
INDICTMENT AND MOTION FOR SEVERANCE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant David Macey, by the undersigned counsel, hereby moves before the Honorable Jennifer H. Rearden of the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, at a date and time to be determined by the Court, for an order dismissing Counts One through Four of the indictment or, in the alternative, severing Mr. Pagan from this trial so that he may be tried separately.

Mr. Macey respectfully requests oral argument in connection with his motion to dismiss the indictment and motion for severance.

Dated: August 8, 2025  
New York, New York

Respectfully submitted,



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